

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

COURTNEY SMITH, a/k/a
COURTNEY ALEXANDER,

Plaintiff,

-vs-

FORD FIELD MANAGEMENT, LLC,

Defendant.

NO: 2:24-cv-12065-JJCG-APP

HON. JONATHAN J.C. GREY

DEPONENT: COURTNEY SMITH a/k/a ALEXANDER

DATE: Friday, April 25, 2025

TIME: 10:02 a.m.

LOCATION: 1901 St. Antoine Street
6th Floor at Ford Field
Detroit, Michigan

REPORTED BY: Colleen R. Joliat, CSR-0923, RPR

Certified Court Reporter/Notary Public

APPEARANCES:

NACHTLAW, P.C.

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Appearing on behalf of the Plaintiff,

Appearances continued....

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1	APPEARANCES (continued):	1	EXHIBITS (continued):
2	BODMAN, PLC	2	Deposition Exhibit #10 73
3	BY: GARY S. FEALK (P-53819)	3	(email chain w/attachments dated 1/19/2024)
4	201 West Big Beaver Road, Suite 500	4	Deposition Exhibit #11 96
5	Troy, Michigan 48084	5	(email chain dated 7/18/2022)
6	(3113) 259-7777	6	Deposition Exhibit #12 97
7	gfealk@bodmanlaw.com	7	(cover letter dated 7/21/2022 with email
8		8	attachments)
9	Appearing on behalf of the Defendant.	9	Deposition Exhibit #13 120
10		10	(email dated 5/17/2022)
11	ALSO PRESENT:	11	Deposition Exhibit #14 121
12		12	(Director of Guest Services job title)
13	Todd Argust	13	Deposition Exhibit #15 141
14		14	(email chain dated 7/16/2021)
15		15	Deposition Exhibit #16 147
16		16	(job performance evaluation)
17		17	Deposition Exhibit #17 151
18		18	(email chain dated 2/1/2022)
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20		20	(job performance summary dated 1/7/2022)
21		21	Deposition Exhibit #19 165
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23		23	Deposition Exhibit #20 177
24		24	(check in meeting document dated 3/15/2022)
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4	Cross-Examination by Mr. Nacht 215	4	2022)
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<p style="text-align: right;">Page 6</p> <p>1 Detroit, Michigan</p> <p>2 Friday, April 25, 2025</p> <p>3 THE COURT REPORTER: Would you raise your</p> <p>4 right hand, please?</p> <p>5 (Witness complies.)</p> <p>6 Do you solemnly swear or affirm that the</p> <p>7 testimony you're about to give in this matter will be</p> <p>8 the truth, the whole truth, and nothing but the truth?</p> <p>9 THE WITNESS: I do.</p> <p>10 -----</p> <p>11 COURTNEY SMITH a/k/a ALEXANDER,</p> <p>12 a witness herein, having been duly sworn, was examined</p> <p>13 and testified under oath as follows:</p> <p>14 MR. FEALK: Let the record reflect that</p> <p>15 this is the deposition of Courtney Alexander Smith in</p> <p>16 the Eastern District Michigan case of Courtney</p> <p>17 Alexander Smith versus Ford Field Management, LLC.</p> <p>18 This deposition is to be used for all</p> <p>19 purposes permitted under the Rules of Civil Procedure</p> <p>20 and the Rules of Evidence.</p> <p>21 Miss Smith, I'm Gary Fealk, I'm the</p> <p>22 attorney for Ford Field. Just like to start with a</p> <p>23 few instructions.</p> <p>24 Have you ever had your deposition taken</p> <p>25 before?</p>	<p style="text-align: right;">Page 8</p> <p>1 instruct you not to answer questions is if I were to</p> <p>2 do something, which I'm not going to do, like ask you</p> <p>3 what you talked about with your attorney. I don't</p> <p>4 want to know that and I'm not going to ask you about</p> <p>5 that.</p> <p>6 We are going to take breaks from time to</p> <p>7 time. And if you need a break just let me know. The</p> <p>8 only requirement that I have for a break is that if I</p> <p>9 ask a question I will expect you to answer the</p> <p>10 question before we take the break. Do you understand</p> <p>11 that?</p> <p>12 THE WITNESS: Yes.</p> <p>13 MR. FEALK: Okay. And you've had your</p> <p>14 deposition taken before, you're probably aware that</p> <p>15 we'll probably start with -- I'm going to start with a</p> <p>16 few introductory questions to get some background.</p> <p>17 Is there any reason while you sit here</p> <p>18 today that your memory is impaired that would prevent</p> <p>19 you from recalling the facts that are related to your</p> <p>20 lawsuit?</p> <p>21 THE WITNESS: No.</p> <p>22 MR. FEALK: Okay. Are you presently under</p> <p>23 the influence of alcohol?</p> <p>24 THE WITNESS: No.</p> <p>25 MR. FEALK: How about illegal drugs?</p>
<p style="text-align: right;">Page 7</p> <p>1 THE WITNESS: Yes, I have.</p> <p>2 MR. FEALK: Okay. So then this may sound</p> <p>3 familiar to you.</p> <p>4 Because this is being recorded by a court</p> <p>5 reporter, we need you to give audible answers, shaking</p> <p>6 the head won't do it. Also, I need you to clearly</p> <p>7 articulate your answer; uh-huh, ugh-uh, it doesn't</p> <p>8 show up real good on the transcript and we want the</p> <p>9 transcript to reflect what you said. So if I</p> <p>10 interrupt you I'm not being rude, I'm just trying to</p> <p>11 make sure we have a good record.</p> <p>12 If you answer the question I will assume</p> <p>13 that you understood it. And if for some reason you</p> <p>14 don't understand a question, please ask me to clarify</p> <p>15 and I'll be happy to do so, because we want to get,</p> <p>16 you know, your truthful answers; and you need to</p> <p>17 understand what the question is to be able to do that.</p> <p>18 You understand that you're under oath so</p> <p>19 you are required to tell the truth, correct.</p> <p>20 THE WITNESS: That is correct?</p> <p>21 MR. FEALK: Now, your attorney may object</p> <p>22 from time to time. But we don't have a judge here to</p> <p>23 rule on whether it's a proper question. So I'll</p> <p>24 listen to the objection, and then I'll say go ahead</p> <p>25 and answer the question. The only time he may</p>	<p style="text-align: right;">Page 9</p> <p>1 THE WITNESS: No.</p> <p>2 MR. FEALK: And are you taking</p> <p>3 prescription medication that would impair your memory</p> <p>4 today?</p> <p>5 THE WITNESS: No.</p> <p>6 MR. FEALK: Okay. In preparation for</p> <p>7 today's deposition, have you reviewed any documents?</p> <p>8 THE WITNESS: Yes.</p> <p>9 MR. FEALK: What did you review?</p> <p>10 THE WITNESS: I reviewed the -- the -- all</p> <p>11 of the -- a few of the -- I'm sorry, I'm nervous.</p> <p>12 I just reviewed all of the documents that</p> <p>13 we -- we've already submitted to --</p> <p>14 MR. FEALK: Are you saying that you</p> <p>15 reviewed the documents that you gave to your attorney</p> <p>16 and your attorney gave to us?</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. FEALK: Okay. Now we received some</p> <p>19 additional documents tomorrow -- or yesterday. Is</p> <p>20 there any reason why that wasn't provided earlier?</p> <p>21 THE WITNESS: It was not provided earlier</p> <p>22 because those documents are just my personal notes and</p> <p>23 I did not know if that was admissible or meaningful</p> <p>24 for this case.</p> <p>25 MR. FEALK: Okay. So what I'm</p>

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<p style="text-align: right;">Page 130</p> <p>1 discrimination?</p> <p>2 I know how you feel, I'm just asking that</p> <p>3 question. That's not necessarily discrimination, is</p> <p>4 it?</p> <p>5 A. If I'm the only black female that works for him, and</p> <p>6 I'm the only one that he's treating like this, I'm the</p> <p>7 only -- he's best friends with all the rest of his</p> <p>8 directors.</p> <p>9 Q. How do you know that?</p> <p>10 A. It seemed to me that he was.</p> <p>11 Q. Okay.</p> <p>12 A. Maybe except for one other one. But he's good friends</p> <p>13 with everybody, but when it comes to me, stone cold.</p> <p>14 Q. Isn't it possible that he thought you weren't doing a</p> <p>15 very good job?</p> <p>16 A. We -- I don't -- I don't know how to answer your</p> <p>17 question. You'll have to rephrase it.</p> <p>18 Q. Isn't it possible that the demeanor that you saw was</p> <p>19 because Todd didn't think you were doing a good job?</p> <p>20 A. You'll have to rephrase it.</p> <p>21 Q. You said that you felt that you're the only black</p> <p>22 female, and Todd was being cold to you, that he was</p> <p>23 being dismissive of you, but he never said anything</p> <p>24 directly regarding race.</p> <p>25 Well, couldn't it have been what you were</p>	<p style="text-align: right;">Page 132</p> <p>1 A. I believe at the time that I was on the DEI Committee</p> <p>2 that that may have been true.</p> <p>3 Q. Okay. So do you know if Veronica Bonner was on the</p> <p>4 DEI Committee?</p> <p>5 A. Yes.</p> <p>6 Q. She's Hispanic?</p> <p>7 A. Yes.</p> <p>8 Q. You were on the DEI Committee, weren't you?</p> <p>9 A. Yes.</p> <p>10 Q. And we know what your race is.</p> <p>11 Joe Keller, what was his role? What was</p> <p>12 Joe's Keller's role; do you know that?</p> <p>13 A. I believe Joe was a member of the DEI Committee.</p> <p>14 Q. Okay. Do you know what his job was with Ford Field?</p> <p>15 A. No.</p> <p>16 Q. He was fired, correct?</p> <p>17 A. I don't know.</p> <p>18 Q. You don't know, okay.</p> <p>19 Mo Pierson, do you know what his race is?</p> <p>20 A. Mo may have joined the DEI Committee a little later.</p> <p>21 But, yes, he's black.</p> <p>22 Q. Okay. Jessica Laramie, do you know who that is?</p> <p>23 A. Yes.</p> <p>24 Q. Is she black?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 131</p> <p>1 feeling was that he thought you weren't doing a very</p> <p>2 good job; isn't that possible?</p> <p>3 A. No. Because I was doing a very good job.</p> <p>4 Q. Whether you were or you were not, isn't it possible</p> <p>5 that Todd felt that you weren't?</p> <p>6 A. No, because I was doing a very good job.</p> <p>7 Q. So you don't think it's possible that Todd felt --</p> <p>8 A. I can't answer that question. I don't know what Todd</p> <p>9 thought or felt --</p> <p>10 Q. Fair enough. Fair enough.</p> <p>11 A. You're asking me what Todd thought or felt --</p> <p>12 Q. Fair enough. You don't know what Todd thought or</p> <p>13 felt.</p> <p>14 A. -- and I cannot answer that question for you.</p> <p>15 Q. Okay, you just did. Thank you.</p> <p>16 MR. NACHT: Off the record.</p> <p>17 (Off the record at 3:07 p.m.)</p> <p>18 (Returned to the record at 3:07 p.m.)</p> <p>19 Q. (By Mr. Fealk) You made a comment in your Complaint</p> <p>20 about September '21, that a diversity, equity, and</p> <p>21 inclusion and belonging council was -- was created and</p> <p>22 the allegation that you're making is that two-thirds</p> <p>23 of the members are white.</p> <p>24 Are you sure about that, the DEI</p> <p>25 Committee?</p>	<p style="text-align: right;">Page 133</p> <p>1 Q. She was on the DEI Committee, right?</p> <p>2 A. She came later, yes.</p> <p>3 Q. And Terrence Thomas is black also, correct?</p> <p>4 A. Yes.</p> <p>5 Q. And he was on the DEI Committee?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Yes?</p> <p>8 THE COURT REPORTER: I need a verbal</p> <p>9 response, please.</p> <p>10 THE WITNESS: Yes.</p> <p>11 Q. (By Mr. Fealk) And Eloui Litsema [phonetic], do you</p> <p>12 know who that is?</p> <p>13 A. I do.</p> <p>14 Q. Okay. And he's Hispanic, correct?</p> <p>15 A. I'm not sure.</p> <p>16 Q. You don't know, okay, fair enough. Was he on the DEI</p> <p>17 Committee?</p> <p>18 A. I believe so.</p> <p>19 Q. How about Amy Lemon, was she on the DEI Committee?</p> <p>20 A. I believe so, yes. So she was a facilitator for it,</p> <p>21 yes.</p> <p>22 Q. And she's white, correct?</p> <p>23 A. I believe so.</p> <p>24 Q. I believe so. She's the director of HR, right?</p> <p>25 A. Yeah.</p>

<p style="text-align: right;">Page 134</p> <p>1 Q. Kind of important to have a director of HR on the DEI 2 Committee, right?</p> <p>3 A. Of course.</p> <p>4 Q. Okay. Who is Steven Hamp?</p> <p>5 A. Mr. Ford.</p> <p>6 Q. Yeah, that's the --</p> <p>7 A. That's Sheila's husband.</p> <p>8 Q. That's Sheila's husband. And Sheila, she's the one 9 that owns the team, right?</p> <p>10 A. Yes.</p> <p>11 Q. Kind of important to have him on the DEI Committee, 12 right?</p> <p>13 A. I don't recall. Maybe he joined one Zoom call. I 14 didn't know he was an official part of the committee.</p> <p>15 Q. What about Allison Maki, what's her role?</p> <p>16 A. Allison, CFO.</p> <p>17 Q. She's white. She was on the DEI Committee, correct?</p> <p>18 A. At the beginning I believe she was.</p> <p>19 Q. So is it fair to say that the DEI Committee was a mix 20 of different people?</p> <p>21 A. When you say a mix of different people --</p> <p>22 Q. A mix of different people that worked in the 23 organization, different races?</p> <p>24 A. Yes. There were a lot of different people on the DEI 25 Committee.</p>	<p style="text-align: right;">Page 136</p> <p>1 A. I am positive about that because they posted a picture 2 of all of the interns. And from the picture it looked 3 like not one was a person of color. And when I 4 brought it up to my fellow DEI members a lot of them 5 agreed that they felt the exact same way, even some of 6 my white DEI members. And they said that they were 7 also disheartened when they saw that picture being so 8 proudly displayed with not one intern of color.</p> <p>9 Q. You say in paragraph 36 that "Lindsay Verstegen voiced 10 concerns about defendant's failure to hire 11 minorities."</p> <p>12 What exactly are you alleging that she 13 said?</p> <p>14 A. Can you read that again?</p> <p>15 Q. In paragraph 36 of your Complaint you're saying during 16 meetings with Chief Diversity Officer Lindsay 17 Verstegen -- I'm sorry, you voiced concerns several 18 times about defendant's failure to hire minorities and 19 she didn't believe in quotas.</p> <p>20 A. Yes.</p> <p>21 Q. What did you say to her and what did she say to you?</p> <p>22 A. Lindsay and I were having conversations. She had just 23 started and so she was sharing some of her plans and 24 goals for DEI and some of the things that she wanted 25 to do.</p>
<p style="text-align: right;">Page 135</p> <p>1 Q. Okay. And at some point did you leave the DEI 2 Committee?</p> <p>3 A. I did not leave the DEI Committee. I did see 4 something, a memo in the notes that Lindsay had 5 considered asking me to leave the DEI Committee 6 because of the low rating that Todd gave me on my 7 evaluation.</p> <p>8 Q. Okay. But you were never actually asked to leave the 9 committee; is that what you're saying?</p> <p>10 A. Lindsay did -- no, I was never asked to leave the DEI 11 Committee.</p> <p>12 Q. Okay.</p> <p>13 A. But that memo that you're referring to is probably an 14 observation made about our interns being all white and 15 there was not one minority in the internship program 16 that year.</p> <p>17 Q. For what year?</p> <p>18 A. I'm assuming 2021.</p> <p>19 Q. Okay.</p> <p>20 A. It was the summer intern list, I believe. Or it may 21 have been 2022.</p> <p>22 Q. Are you positive about that?</p> <p>23 A. No, I'm not positive about what year.</p> <p>24 Q. No, but I mean, are you positive that they were all 25 white interns?</p>	<p style="text-align: right;">Page 137</p> <p>1 And when she first started she -- you 2 know, we had those conversations. And so I 3 questioned -- I asked her what was she -- what were 4 her plans to bring more minorities here to work at 5 Ford Field.</p> <p>6 And she told me, well, I don't believe in 7 quotas. I don't believe in quotas. And so --</p> <p>8 Q. Is there anything wrong with not believing in quotas?</p> <p>9 A. There's nothing wrong with not believing in quotas. 10 But I was trying to understand -- I felt like when I 11 asked her that that she felt like I was challenging 12 her authority in some way. And that it was almost a 13 negative thing that I brought that up because I felt 14 her defenses were up a little when I asked kind of the 15 plans to bring in more minority hires.</p> <p>16 Q. Did Lindsay ever do anything or say anything that you 17 felt was discriminatory?</p> <p>18 A. Again, just the demeanor that she had when she sternly 19 told me that she didn't believe in quotas. I felt as 20 though she was offended by me asking that question.</p> <p>21 Q. Were you -- Did you alter the time cards of Nisha 22 Collins and Stephen Rafferty to take overtime out of 23 their pay?</p> <p>24 A. No, I did not. During Covid -- During Covid we were 25 told by payroll to make sure that we approved time</p>

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<p style="text-align: right;">Page 214</p> <p>1 A. I probably glanced at it.</p> <p>2 Q. Okay.</p> <p>3 (Deposition Exhibit #27 was marked for</p> <p>4 identification.)</p> <p>5 Q. (By Mr. Fealk) So what this is, I'm going to tell you</p> <p>6 what I think it is, but I'm going to ask you a</p> <p>7 question to see if you -- it's a cover page and it's</p> <p>8 the statement on discrimination -- on</p> <p>9 nondiscrimination.</p> <p>10 So would you have -- have you seen this</p> <p>11 policy that I just gave to you on page 2?</p> <p>12 A. I don't remember seeing this policy.</p> <p>13 Q. Okay. Fair enough.</p> <p>14 A. Especially in 2004.</p> <p>15 Q. Okay.</p> <p>16 A. Isn't there a new -- there should be an updated</p> <p>17 version. Where is the 2022, 2024?</p> <p>18 Q. I'm asking you if you've seen this policy and you said</p> <p>19 you don't know; is that correct?</p> <p>20 A. I don't know.</p> <p>21 Q. But you do know there was a policy against</p> <p>22 discrimination?</p> <p>23 MR. NACHT: Asked and answered.</p> <p>24 Q. (By Mr. Fealk) Yes?</p> <p>25 A. Asked and answered.</p>	<p style="text-align: right;">Page 216</p> <p>1 MR. NACHT: Nothing further.</p> <p>2 MR. FEALK: I don't have anything further.</p> <p>3 MR. NACHT: We will order.</p> <p>4 MR. FEALK: Yes. I will take the</p> <p>5 transcript as well.</p> <p>6 (Deposition concluded at 5:53 p.m.)</p> <p>7 -----</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 215</p> <p>1 Q. Did you know you could complain to HR about</p> <p>2 discrimination and harassment and retaliation?</p> <p>3 A. Can you repeat your question?</p> <p>4 Q. Did you know that you could complain to HR, human</p> <p>5 resources, about discrimination and retaliation?</p> <p>6 A. I complained to HR about the biased treatment that I</p> <p>7 was receiving.</p> <p>8 Q. So you knew you could complain about that?</p> <p>9 A. I did.</p> <p>10 MR. FEALK: Okay. I have no further</p> <p>11 questions.</p> <p>12 MR. NACHT: I just have one question.</p> <p>13 CROSS-EXAMINATION</p> <p>14 BY MR. NACHT:</p> <p>15 Q. Is there any doubt in your mind that human resources</p> <p>16 and your boss, Mr. Argust, understood that you had</p> <p>17 lupus which would have flare-ups?</p> <p>18 MR. FEALK: Objection, leading.</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: There is no --</p> <p>21 Q. (By Mr. Nacht) I'll rephrase it. Do you have a</p> <p>22 belief, yes or no, as to whether human resources and</p> <p>23 your boss had knowledge that you had a chronic illness</p> <p>24 that would cause you from time to time to need rest?</p> <p>25 A. Yes, they were aware of my flare-ups.</p>	<p style="text-align: right;">Page 217</p> <p>1 STATE OF MICHIGAN)</p> <p>2) ss.</p> <p>3 COUNTY OF GENESEE)</p> <p>4</p> <p>5 I, Colleen R. Joliat, CSR-0923, RPR, Notary</p> <p>6 Public in and for Genesee County, Michigan, do hereby</p> <p>7 certify that I conducted the examination of</p> <p>8 COURTNEY SMITH a/k/a ALEXANDER, the deponent in the foregoing</p> <p>9 deposition; that prior to the taking of said deposition,</p> <p>10 the said deponent was duly sworn to tell the truth, the</p> <p>11 whole truth and nothing but the truth; that the deponent</p> <p>12 was carefully examined upon her oath; and deponent's</p> <p>13 examination was reduced to typewritten form by me and the</p> <p>14 foregoing two hundred sixteen (216) pages constitute a true</p> <p>15 record of the testimony given by the aforesaid witness.</p> <p>16 IN WITNESS WHEREOF, I have hereunto set my hand</p> <p>17 this day in Grand Blanc, County of Genesee, Michigan.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;"><i>Colleen Joliat</i></p> <p>Colleen R. Joliat, CSR-0923, RPR Certified Shorthand Reporter Notary Public, Genesee County, MI My commission expires: 6-08-25</p>